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August 9, 2004

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW, TW-A325
Washington, DC 20554

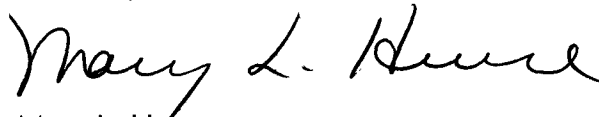
Re: WC Dockets 02-112, 01-321, and 03-197; CC Docket 96-149

Dear Ms. Dortch,

On August 6, the undersigned, Kevin Graulich, Craig Lutz, Bobbie Middlebrook, and Cheryl Laskowski of BellSouth met with Julie Veach, Bill Dever, Michael Carowitz, Brad Koerner, and Ben Childers of the Wireline Competition Bureau. Al Varner and Dave Coon of BellSouth participated via conference call. The purpose of the meeting was to provide an overview of BellSouth's processes for ordering, provisioning, and maintaining Special Access services. A copy of the presentation is attached.

This notice is being filed pursuant to Sec. 1.1206(b)(2) of the Commission's rules. If you have any questions regarding this filing please do not hesitate to contact me.

Sincerely,



Mary L. Henze

cc: J. Veach
B. Dever
M. Carowitz
B. Koerner
B. Childers



BellSouth Special Access Processes Ordering, Provisioning and Maintenance

August 6, 2004



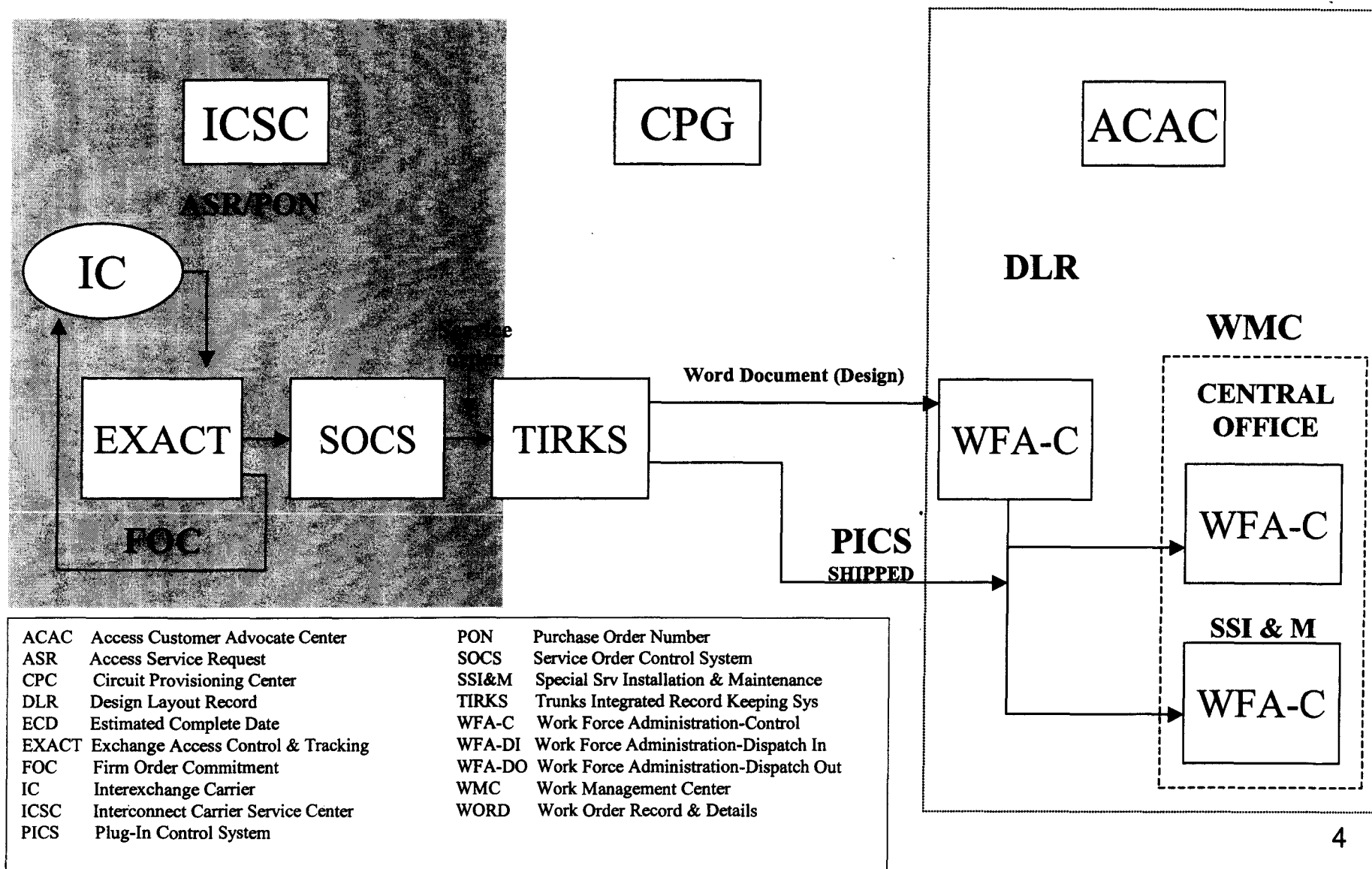


BellSouth Special Access: Ordering

>> Special Access Pre-Ordering

- Customer Pre-Order Validation
 - DSO
 - Via electronic interface systems - Common Access Front End (Café) and/or Access Gateway - an IXC can validate Network Channel (NC), Network Channel Interface (NCI) Codes, Carrier Facility Assignment (CFA), and Street Address
 - DS1
 - Via Cafe and/or Access Gateway an IXC can verify facility availability for determination of appropriate standard installation interval
 - Can also validate NC/NCI Codes, CFA, and Street Address
 - DS3
 - Via Cafe and/or Access Gateway an IXC can validate NC/NCI Codes, CFA, and Street Address

>> Ordering & Provisioning Process Workflow



>> Special Access Ordering

- Access Service Request (ASR)
 - IXC submits ASR via electronic interface systems, CAFÉ or Access Gateway or directly through Exact (BellSouth's electronic ordering system)
 - DSO
 - Standard Provisioning Interval Available
 - 6-business day provisioning interval
 - DS1
 - Mechanized Facility Assignment System (FAS) verifies facilities on-net/off-net
 - On-net (fiber) – 5-business day provisioning interval
 - Off-net (copper/metallic) – 8-business day provisioning interval
 - DS3
 - Provisioning intervals dependent on service configuration
 - A service inquiry process [Complex Service Profile System (CSPS)] is used to mechanically distribute the request internally to verify facilities
 - IXC Submits ASR Supplements

>> Special Access Ordering

- Firm Order Confirmation (FOC)
 - DSO/DS1
 - Automated system provides a mechanized FOC within established guidelines if IXC has utilized upfront validation process and facilities are available
 - FOC Interval - 48 Hours
 - If upfront validation has not been used and information is incomplete or incorrect the request is placed in clarification pending receipt of a supplement
 - Mechanized clarification/notification sent back to customer

>> Special Access Ordering

- Firm Order Confirmation (FOC)
 - DS3
 - FOC is submitted based on facility availability checked thru the service inquiry process
 - FOC interval - 120 hours
 - If an upfront validation system is not used and information is incomplete or incorrect, the request is placed in clarification pending receipt of a supplement
 - If facilities not available due to BST reason, an estimated completion date is provided to the customer
 - If facilities not available due to end user customer reason, information is provided to the IXC and ASR is placed in Clarification pending receipt of an ASR supplement
 - Service Reps monitor all ASR requests to ensure timely FOCs
 - Daily mechanized work list and reports
 - Managers are required to verify all ASRs for processing and provide a status

>> Special Access Ordering

- Pending Facilities (PF) (Prior to FOC)
 - PF'd conditions may be within the responsibility of BST, IXC, End User, or Independent Telephone Company
 - PF'd orders are distributed to the Outside Plant Engineering Organization
 - Responsible for providing facility availability information within 72hrs
 - Timeframe is monitored by Service Rep and the Network Provisioning Resolution Center (NPRC) via mechanized reporting
 - Provide IXC with estimated completion date and committed due date via electronic Customer Notification Request (CNR)
 - Upon customer acceptance FOC is sent to IXC

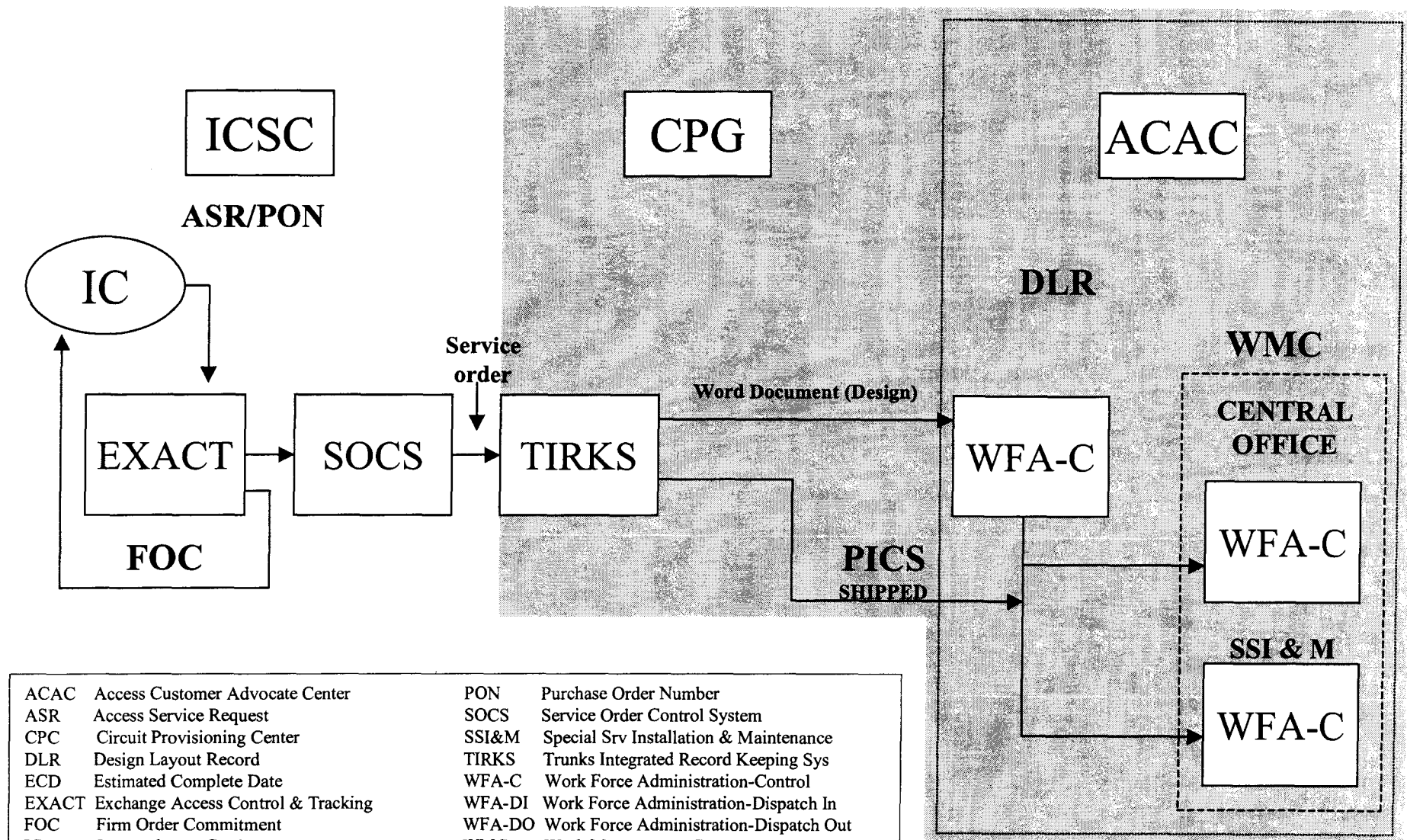
>> Special Access Ordering

- Project Handling
 - BST has a group which is responsible for project coordination
 - The IXC provides notification of a project to the Sales Account Team
 - Project guidelines available on BellSouth Interconnection Website
 - Account team provides the scope of project to the Project Management Group
 - Project complexity, scope and Customer Desired Due Date contribute to the committed provisioning interval
 - Project Management Group conducts internal departmental meeting(s) to establish Customer Due Date
 - BellSouth actively coordinates with the customer throughout the project



BellSouth Special Access: Provisioning

>> Ordering & Provisioning Process Workflow



ACAC	Access Customer Advocate Center	PON	Purchase Order Number
ASR	Access Service Request	SOCS	Service Order Control System
CPC	Circuit Provisioning Center	SSI&M	Special Srv Installation & Maintenance
DLR	Design Layout Record	TIRKS	Trunks Integrated Record Keeping Sys
ECD	Estimated Complete Date	WFA-C	Work Force Administration-Control
EXACT	Exchange Access Control & Tracking	WFA-DI	Work Force Administration-Dispatch In
FOC	Firm Order Commitment	WFA-DO	Work Force Administration-Dispatch Out
IC	Interexchange Carrier	WMC	Work Management Center
ICSC	Interconnect Carrier Service Center	WORD	Work Order Record & Details
PICS	Plug-In Control System		

>> Special Access Provisioning

- Tools utilized to ensure provisioning and turn-up of service
 - A clean order flows to Network for design, installation and turn-up
 - Each circuit is assigned critical dates
 - SID, LAM, RID/DLR, DVA, WOT, PTD, DD
 - Functional groups within BST are responsible for completing their assigned critical date
 - Internal escalations to ensure critical dates are met
 - Internal tools used by responsible organization to manage work load and critical dates

>> Special Access Provisioning

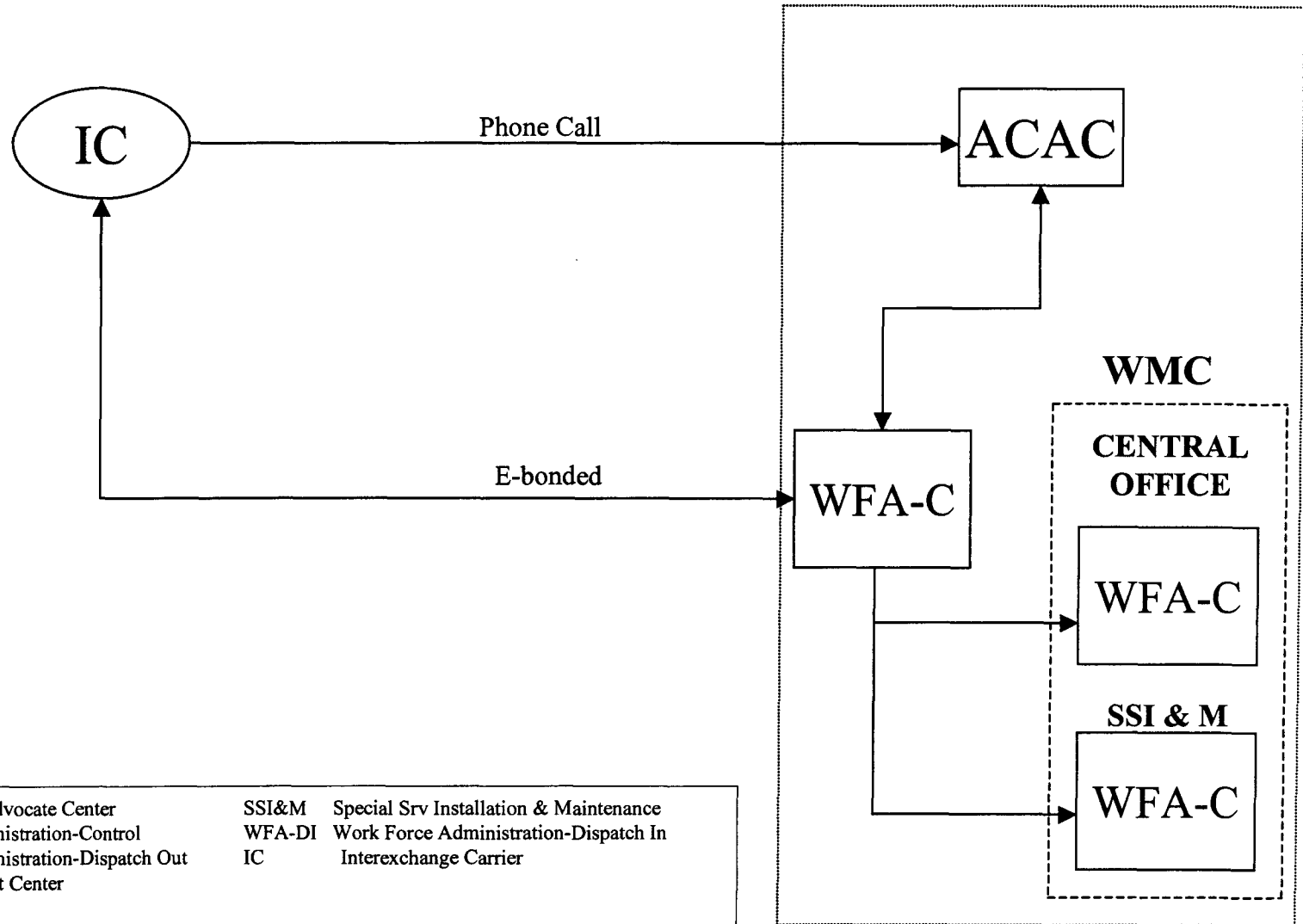
- Service Order close out
 - Perform end-to-end Full Acceptance Test
 - Obtain concurrence with IXC prior to completing Service Order
 - This can be done electronically or by phone
 - BellSouth conveys to the IXC at the time of completion the test results, CFA (Carrier Facility Assignment) and DMARC information
 - Orders completed after the due date are closed with an appropriate provisioning disposition code
- High Level Test Procedures
 - Each service type has specified design parameters
 - Design parameters for DS1/DS3 services are outlined in Telcordia practice GR-342-CORE and referenced in BellSouth Tariff



BellSouth Special Access: Maintenance



Maintenance Process Workflow



ACAC Access Customer Advocate Center
WFA-C Work Force Administration-Control
WFA-DO Work Force Administration-Dispatch Out
WMC Work Management Center

SSI&M Special Srv Installation & Maintenance
WFA-DI Work Force Administration-Dispatch In
IC Interexchange Carrier

>> Special Access Maintenance

- Maintenance Procedures
 - Trouble tickets received via E-bonding or Telephone call from IXC
 - Conduct internal testing to isolate where trouble condition exists
 - Dispatch if necessary
 - Repair and coordinate joint testing
 - After repair, customer to verify and accept service
 - Actual restoral time is mutually agreed to by BellSouth and IXC
 - The repair time clock is stopped for customer caused reasons
 - Each trouble ticket requires a disposition code once it is closed indicating the fix action
 - Analysis codes are used both to determine cause and actual repairs
 - If a trouble condition is not found, BellSouth will return the circuit to the IXC as a TOK (Test O.K.)

>> Special Access Escalation Policy

- Ordering/Provisioning
 - Established internal Regional Escalation Procedures for determining when and how escalations should be performed
 - BST accepts all escalations from our external customers
- Maintenance
 - Established internal Regional Escalation Procedures for determining when and how escalations should be performed
 - Escalations are performed at specific time intervals
 - Automatic timers are set to notify the technicians when commitments are in jeopardy of being missed
 - Allow customers to prioritize their repair work by escalating